

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

WILLIAM E. CHADWICK, JR.

Plaintiff,

v.

Case No.

11-412

**ANSCHUTZ ENTERTAINMENT
GROUP, INC.,**

**Serve: CT Corporation System
120 S. Central Ave.
Clayton, Mo. 63105**

Defendant.

COMPLAINT

Plaintiff William E. Chadwick, Jr., by and through counsel, alleges and states for his Complaint against the defendant, Anschutz Entertainment Group, Inc.:

1. Plaintiff is an individual who, at all times relevant, is and was a citizen and resident of the state of Kansas.

2. Defendant is, and at all times material was, a foreign corporation organized and existing under the laws of the state of Colorado, which is registered to do business in the state of Missouri, is doing business in the state of Missouri, is a citizen of both Colorado and Missouri, and can be served with process by delivering a copy of the summons and the Complaint to its registered agent, CT Corporation System, at 120 S. Central Ave., Clayton, Missouri 63105.

3. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §1332 as the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs, and Plaintiff and Defendant are citizens of different American states.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a).

5. Defendant, at all times material, possessed, operated, occupied and/or controlled premises commonly known as the Sprint Center located at 1407 Grand Boulevard in Kansas City, Jackson County, Missouri (hereinafter “the Sprint Center”).

6. On the 8th day of May, 2010, Plaintiff was attending a Hank Williams, Jr. concert at the Sprint Center in Kansas City, Missouri pursuant to a ticket he had purchased to attend the event.

7. As Plaintiff was walking along the first floor concourse to return to his seat, he turned from the concourse toward the entrance to his seating section, slipped on spilled beer, and fell to the concrete floor.

8. At the time Plaintiff fell, an employee of the defendant was at or near the spilled beer waiting for another person and/or employee of the defendant to bring him a mop to remove beer from the floor.

9. The occupier of premises on which the public is invited has a duty to use ordinary care to remove, barricade, or warn of unreasonably unsafe conditions on the owner/occupier's premises.

10. At the time of the plaintiff's fall, the floor at the Sprint Center was not

reasonably safe because there was beer on the floor.

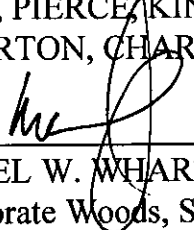
11. The defendant knew or by using ordinary care could have known of this condition, but failed to use ordinary care to remove it, barricade it, or warn of it.

12. As a direct and proximate result of the defendant's negligence, Plaintiff suffered injuries and damages including injuries to his right elbow, neck and back. Plaintiff has undergone reasonable and necessary medical care for these injuries and has incurred reasonable medical expenses as a result of this treatment. In addition, it is probable that he will incur additional reasonable and necessary medical expenses for treatment of his injuries in the future. Plaintiff has also consciously experienced pain, suffering, and mental anguish, lost enjoyment of life, and a resulting disability; in addition, he is likely to continue to experience and suffer all such losses in the future as a result of his injuries and the defendant's negligence.

WHEREFORE Plaintiff William E. Chadwick, Jr. prays the Court enter judgment in her favor and against Defendant Anschutz Entertainment Group, Inc. in an amount exceeding Seventy Five Thousand Dollars (\$75,000.00), for his costs incurred herein, and for such other and further relief as the Court deems just and proper in the premises.

Respectfully submitted,

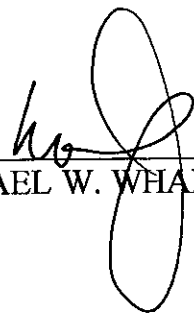
COUCH, PIERCE KING
& WHARTON, CHARTERED



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ATTORNEYS FOR PLAINTIFF

DEMAND FOR JURY TRIAL

COMES NOW the plaintiff, William E. Chadwick, Jr., and demands trial by jury on all issues so triable.



MICHAEL W. WHARTON